

Harnik Wilker & Finkelstein LLP
Attorneys for Plaintiff
Greystone CDE, LLC
Olympic Tower
645 Fifth Avenue, 7th Floor
New York, NY 10022-5937
Tel. No. (212) 599-7575
Facsimile (212) 867-8120
Email: stephen@harnik.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Greystone CDE, LLC,

Docket No. 07 civ. 8377 (RPP)

Plaintiff,

- against -

Sante Fe Pointe, L.P.,
Sante Fe Pointe Management, LLC,
Rant LLC, and
Theotis F. Oliphant

**NOTICE OF CROSS-MOTION
FOR ENTRY OF DEFAULT
JUDGMENT; IN THE ALTERNATIVE
TO STRIKE DEFENDANTS' PERSONAL
JURISDICTION DEFENSE**

Defendants.

-----X

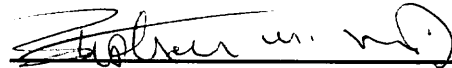
S I R S:

PLEASE TAKE NOTICE, that upon the Declaration of Stephen M. Harnik, Esq., dated January 22, 2008 with exhibits attached; the Memorandum of Law of even date submitted herewith, and upon all prior pleadings and proceedings had herein, the undersigned will move this Honorable Court, Robert P. Patterson, Jr. United States District Judge, on the 13 day of February 2008 at 4:00 p.m. or as soon thereafter as counsel may be heard, or at such other date and time as the court may direct, at the United States Federal Courthouse, 500 Pearl Street, New York, NY 10007-1312, for an Order pursuant to Fed. R.Civ. P. 12(h) 26(b), and 55(b)(2) for entry of a default judgment; in the alternative to strike defendants' personal jurisdiction defense; and for such other and further relief as the Court deems just and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE, that pursuant to L.C.R. 6.1, any opposing affidavits and answering memoranda shall be served within ten (10) business days after service hereof.

Dated: New York, New York
January 22, 2008

Harnik Wilker & Finkelstein LLP



by: Stephen M. Harnik, Esq. (SH 9889)
Attorneys for Plaintiff
Greystone CDE, LLC
645 Fifth Avenue, 7th Floor
New York, NY 10022
(212) 599-7575

To: Donald N. David, Esq.
Brian A. Bloom, Esq.
Jeremy A. Shure, Esq.
Akerman Senterfitt LLP
Attorneys for Defendants
335 Madison Avenue, Suite 2600
New York, NY 10017
(212)880-3800